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10 *Attorneys for Defendants*
11 *C. R. Bard, Inc. and*
12 *Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL CERTAIN
EXHIBITS IN SUPPORT OF
DEFENDANTS' RESPONSE IN
OPPOSITION TO PLAINTIFF'S
MOTION *IN LIMINE* NO. 3**

(Assigned to the Honorable David G. Campbell)

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Bard”), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6, file this Notice of Lodging Under Seal certain exhibits attached in support of Defendants’ Response in Opposition to Plaintiff’s Motion *In Limine* No. 3. These exhibits contain Plaintiff’s personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Defendants have notified Plaintiff of their intent to

1 file this Notice of Lodging. Because the documents lodged under seal only relate to
2 Plaintiff's personal healthcare information, Defendants note that it is Plaintiff's burden to
3 file a motion to seal. A list of the exhibits lodged under seal, are attached hereto as
4 Exhibit A.

5 RESPECTFULLY SUBMITTED this 25th day of April, 2018.

6 s/ Richard B. North, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/ Richard B. North, Jr.
Richard B. North, Jr.

Nelson Mullins Riley & Scarborough

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1 **EXHIBIT A**

2 **DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**

3 Defendants request they be permitted to file under seal the following documents in
4 support of their Response in Opposition to Plaintiff's Motions *In Limine* No. 2:

5 1. Exhibit B – Excerpt of deposition testimony of Colleen Taylor, M.D.

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